

# **JAFFE EXHIBIT 130**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

5 WAYMO LLC, )  
6 Plaintiff, )  
7 vs. ) Case No.  
8 UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
9 OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
10 Defendants. )

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VIDEOTAPED DEPOSITION OF WILLIAM GROSSMAN  
San Francisco, California  
Friday, March 24, 2017  
Volume I

Reported by: SUZANNE F. GUDELJ  
CSR No. 5111  
Job No. 2577640  
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1 A No.  
2 Q Elaborate.  
3 A Because as I --  
4 MR. JAFFE: Sorry. Objection. Form.  
5 BY MR. GONZALEZ: 10:15:26  
6 Q Can you clarify what you mean?  
7 A Can you repeat the question?  
8 Q Yeah. You said you thought it was  
9 interesting because of the nature of the content.  
10 A Yes. 10:15:40  
11 Q So I will use your words. What did you  
12 mean when you said "the nature of the content"?  
13 A Well, after looking at the content in more  
14 detail, I realized that it was very similar to -- to  
15 Waymo's -- some of Waymo's laser systems. 10:15:57  
16 Q So what was similar?  
17 A The shape of the board.  
18 Q I don't have an engineering degree, so I  
19 want to make sure I'm understanding what you're  
20 saying. If you look -- I see some pictures on the 10:16:15  
21 last two pages of this exhibit. Is that what you're  
22 referring to?  
23 A Yes.  
24 Q And what is it about the shape of the board  
25 that you found interesting? 10:16:27

1 A It looked very similar to designs we have  
2 in-house.

3 Q And how do you know that?

4 A I know that because previously I had talked  
5 with the laser team, and I'd -- I just happened to 10:16:42  
6 have a conversation about this particular part of  
7 the system. And it's -- it's a very striking shape,  
8 and you just remember it, and so when I saw it, I  
9 immediately recognized it.

10 Q Was there anything in particular about the 10:16:58  
11 shape that -- that caught your attention?

12 A The angles and sides of the PCB.

13 Q Was there anything else that you found  
14 interesting about the email and document other than  
15 the shape? 10:17:17

16 A No.

17 Q And when you say "the shape," again, I'm  
18 just trying to make sure I understand you.

19 A Yep.

20 Q We'll take the one on the last page. The 10:17:29  
21 last page of the exhibit has one -- what do you call  
22 this, a board?

23 A Yeah, a PCB.

24 Q Okay. PCB?

25 A Yeah. 10:17:39